

DECLARATION OF REBECCA KOVALICH

North Carolina

County of Forsyth

I, Rebecca Kovalich, declare that:

1. I am over the age of 18 and suffer from no legal disabilities. The information contained in this affidavit is based upon personal knowledge.
2. At the time I was terminated, I was developing age management tests for PPM. This was an extremely time-consuming process, and it was a lot of work. Much of this work was with Dr. Scheutzow.
3. I was also doing the number work and the budget for the laboratory. After my termination, Gretchen Hawks called me and said that Mary Benton wanted her to do these tasks, but Hawks did not know how. She said it wasn't her job and she couldn't do it, so she was going to tell Benton to find someone else.
4. I approved every laboratory invoice that was needed—I would travel all the way to Greensboro and go through them and sign off on them. If wasn't around, they'd be faxed to me. I did this up until I was fired. After I left, Gretchen Hawks started doing the invoices.
5. At the time of my termination, the laboratory was making an incredible amount of money for PPM. In 2015, it made almost \$5,000,000, and I knew this because I handled the laboratory's financials.
6. When Dr. Spivey kissed me in his office in October 2015, it was in no way welcome. It was a shock. I made it clear that it was unwelcome.

7. During my employment with PPM, Dr. Spivey regularly made verbal romantic comments and propositions. I think he was testing me and to see how far he could go; he kept trying, and I kept rejecting him. This culminated with the unwelcome kiss in October 2015.
8. After this, I never felt comfortable at PPM. I was upset that Dr. Spivey did that to me in October. It was clear after that that he was colder to me and treated me differently. He became very distant, and that never changed until my termination.
9. The statements made in this affidavit are true and correct.
10. I make this statement based solely upon my own personal knowledge.
11. I make this statement by my own free will and volition without promise of any benefit for doing so and without threat of any penalty or consequence for not doing so.
12. I declare under penalty of perjury under the laws of the United States of America and the State of North Carolina that the foregoing is true and correct.
13. This declaration is made pursuant to 28 U.S.C. § 1746.

This the 31 day of October, 2018.



Rebecca Kovalich